

BellSouth Florida OSS Testing Evaluation

Date: July 19, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Documentation Review of the Change Management Process (PPR1).

Exception:

The BellSouth Change Control Prioritization Process does not allow CLECs to be involved in prioritization of all CLEC impacting Change Requests.(PPR1)

Background:

The Change Control Prioritization (CCP) Process is the method used by both CLECs and BellSouth to rank the importance of both CLEC and BellSouth-initiated change requests. The Prioritization process is outlined in the description of Step Five of the overall Change Control process¹ in the BellSouth Change Control Process document².

BellSouth also utilizes an internal prioritization process in conjunction with the CCP. The internal prioritization process occurs during Step Seven of the Change Control Process and includes review of the ranking determined by the CLECs during Step Five of the Change Control Process. The process is as follows:

- The Release Prioritization Team considers all changes from a variety of sources including the (external) Change Control Process, the Third Party Testing Team, the Regulatory Team, and the LCSC and prioritizes them into one master list.
- The Release Prioritization Team creates the master list and integrates the changes from the different sources using the following procedure: The number one priority change requested from each group is ranked in the master list from one to five with one being the highest. The team then ranks the number two priority change requests from each group from six to ten. The number three priority change requests are ranked from 11 to 15 and so forth.
- Additional factors are considered during the reprioritization process and may result in one customer group having a disproportionate number of Change Requests ranked at the top of the master list: These additional considerations are as follows:
 - i. Regulatory changes that have been mandated and are due during this release cycle are prioritized first.

² v. 2.3, May 18, 2001

¹ Pages 28-29 and page 47.



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- ii. Change Requests that have related functions are given a higher priority than standalone changes.
- iii. Change Requests that are necessary for proper system operation are given a high priority.
- iv. Change Requests that are necessary for or concurrent with the implementation of additional change requests are given high priority.

During interviews with members of the BellSouth Internal Change Management Team conducted by KPMG Consulting, BellSouth asserted that all change requests included in the master prioritization list are related to the Wholesale portion of BellSouth's business.

The BellSouth Change Control Process³ states that the BellSouth Change Control Process is designed to manage all change requests "that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification."

Issue:

CLECs are unable to participate in the prioritization of change requests that originate from internal BellSouth organizations (Regulatory Team, Third Party testing Team, the LCSC, and Project Managers) that affect BellSouth's Wholesale business and therefore the CLEC Community. This policy inhibits one of the primary objectives of the CCP "to allow for mutual impact assessment and resource planning to manage and schedule changes."

Impact:

BellSouth's Internal Change Management Prioritization Process does not allow the CLEC community to participate in prioritization of change requests that effect CLEC Business. The CLEC Community's lack of participation in change requests that effect CLEC business could result in change requests important to the CLEC Community not being developed or implemented in a timely manner.

³ Version 2.3, May 18, 2001



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July 25, 2001

EXCEPTION REPORT

Exception:

The BellSouth Change Control Prioritization Process does not allow CLECs to be involved in prioritization of all CLEC impacting Change Requests. (PPR1)

Background:

The Change Control Prioritization (CCP) Process is the method used by both CLECs and BellSouth to rank the importance of both CLEC and BellSouth-initiated change requests. The Prioritization process is outlined in the description of Step Five of the overall Change Control process¹ in the BellSouth Change Control Process document².

BellSouth also utilizes an internal prioritization process in conjunction with the CCP. The internal prioritization process occurs during Step Seven of the Change Control Process and includes review of the ranking determined by the CLECs during Step Five of the Change Control Process. The process is as follows:

- The Release Prioritization Team considers all changes from a variety of sources including the (external) Change Control Process, the Third Party Testing Team, the Regulatory Team, and the LCSC and prioritizes them into one master list.
- The Release Prioritization Team creates the master list and integrates the changes from the different sources using the following procedure: The number one priority change requested from each group is ranked in the master list from one to five with one being the highest. The team then ranks the number two priority change requests from each group from six to ten. The number three priority change requests are ranked from 11 to 15 and so forth.
- Additional factors are considered during the reprioritization process and may result in one customer group having a disproportionate number of Change Requests ranked at the top of the master list: These additional considerations are as follows:
 - i. Regulatory changes that have been mandated and are due during this release cycle are prioritized first.

¹ Pages 28-29 and page 47.

² v. 2.3, May 18, 2001

- ii. Change Requests that have related functions are given a higher priority than standalone changes.
- iii. Change Requests that are necessary for proper system operation are given a high priority.
- iv. Change Requests that are necessary for or concurrent with the implementation of additional change requests are given high priority.

During interviews with members of the BellSouth Internal Change Management Team conducted by KPMG Consulting, BellSouth asserted that all change requests included in the master prioritization list are related to the Wholesale portion of BellSouth's business.

The BellSouth Change Control Process³ states that the BellSouth Change Control Process is designed to manage all change requests "that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification."

Issue:

CLECs are unable to participate in the prioritization of change requests that originate from internal BellSouth organizations (Regulatory Team, Third Party testing Team, the LCSC, and Project Managers) that affect BellSouth's Wholesale business and therefore the CLEC Community. This policy inhibits one of the primary objectives of the CCP "to allow for mutual impact assessment and resource planning to manage and schedule changes."

Impact:

BellSouth's Internal Change Management Prioritization Process does not allow the CLEC community to participate in prioritization of change requests that effect CLEC Business. The CLEC Community's lack of participation in change requests that effect CLEC business could result in change requests important to the CLEC Community not being developed or implemented in a timely manner.

BellSouth Response:

The Change Control Prioritization Process does allow CLECs to be involved in the prioritization of CLEC impacting Change Requests. A CLEC impacting Change Request is defined as, "Any change that either requires the CLEC to modify the way it operates or causes it to rewrite system code." Examples of this are:

³ Version 2.3, May 18, 2001

- Business rule LSR field usage changes
- New functionality for an interface
- Change existing functionality for an interface
- New REQTYPs
- New field on the LSR form
- Electronic ordering of a product/service

This definition should impact the majority of the CLEC community, if not the entire community, since it is impossible to know how each CLEC has coded its systems.

CLEC impacting change requests may originate from various sources: the (external) Change Control Process, the Third Party Testing Team, the Regulatory Team, the LCSC, or Project Managers. It is transparent to the CLECs what internal BellSouth entity is the actual originator of a request since the originator is only identified, on the Change Request form, as BellSouth. Thus, CLECs have already prioritized Change Requests originated by internal BellSouth organizations in four separate Change Review Meetings. Mandates are not prioritized by the CLECs per the Change Control Process.

All such Change Requests should come through the Change Control Process providing the CLECs an opportunity to prioritize them. As a result of BellSouth's commitment to provide CLECs the ability to participate in the prioritization of these requests, BellSouth has a better understanding of what is important to the CLEC community.



BellSouth Florida OSS Testing Evaluation

Date: August 7, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Functional Carrier Bill Evaluation (TVV11).

Exception:

BellSouth delivered Resale bills to KPMG Consulting reflecting incorrect usage charges for calls made by KPMG Consulting during the course of the Functional Carrier Bill Evaluation (TVV11).

Background:

For calls placed by the KPMG Consulting Reseller, BellSouth's billing guidelines stipulate that charges will be calculated following BellSouth's established Tariff rates, less the appropriate wholesale discount.

Issue:

During the period between May 29-June 1, 2001, KPMG Consulting conducted a DUF retest. KPMG Consulting placed calls from five different locations on a variety of switch types during this retest. Upon review of the resale bills from BellSouth following test execution, KPMG Consulting noted that the associated bills incorrectly reflect charges for intralata toll, collect and third party calls. The following tables show the noted occurrences

Intralata Toll Calls 1:

Date	From Number	Initiation Time	To Number	Bill Number	Expected Charge	Actual Charge
05/31/2001	3059538819	12:49:45	5616553735	3059538819	\$0.50	\$0.64
05/30/2001	5618325672	10:21:24	3056858869	5618325672	\$0.48	\$0.61
05/31/2001	8504393341	16:44:54	8506783815	8504393341	\$0.17	\$0.09
05/31/2001	8504393341	16:44:07	8502444252	8504393341	\$0.10	\$0.06
05/30/2001	8504393341	19:01:18	8502432135	8504393341	\$0.13	\$0.09
05/30/2001	8504393341	19:02:21	8502444252	8504393341	\$0.08	\$0.05
05/30/2001	8504393341	19:03:00	8506783815	8504393341	\$0.08	\$0.06



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Collect Calls Table 2:

Date	From Number	Initiation Time	To Number	Billed Number	Expected Charge	Actual Charge
05/30/2001	8504385942	10:23:28	8504370537	8504370537	\$2.05	\$1.54
05/30/2001	8504370537	9:59:36	8504291707	8504291707	\$2.05	\$1.56
05/30/2001	8504370537	10:18:00	8504385942	8504385942	\$2.05	\$1.93
05/29/2001	8504370537	11:32:45	8504385942	8504385942	\$1.56	\$1.46
05/30/2001	8504291707	9:42:51	8504385942	8504385942	\$1.56	\$1.46
05/30/2001	8504393341	9:51:49	8504370537	8504370537	\$1.56	\$1.46
05/30/2001	8504393341	10:41:49	8504291707	8504291707	\$2.05	\$1.95
05/30/2001	5615140599	16:47:21	5618325672	5618325672	\$1.92	\$1.84
05/30/2001	5615140614	15:26:01	5618325672	5618325672	\$1.45	\$1.37
05/30/2001	5615140614	16:11:15	5618325672	5618325672	\$1.92	\$1.84

Third Party Calls Table 3:

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Date	From Number	Initiation Time	To Number	Bill Number	Expected Charge	Actual Charge	
05/30/2001	8504370537	10:38:41	8509325361	8504385942	\$2.05	\$1.46	
05/31/2001	8504393341	10:36:04	8504375873	8504291707	\$2.05	\$1.56	
05/30/2001	8504385942	10:44:24	8509392321	8504370537	\$1.92	\$1.54	
05/30/2001	8504385942	11:21:44	8504344546	8504370537	\$1.92	\$2.04	
05/30/2001	8504291707	11:24:54	8504777155	8504385942	\$2.05	\$1.93	
05/30/2001	8504370537	11:16:51	8504344565	8504385942	\$2.05	\$1.93	
05/29/2001	8504370537	11:53:03	8504799091	8504385942	\$1.56	\$1.46	
05/30/2001	8504393341	11:19:34	8504344565	8504291707	\$1.56	\$1.46	
05/30/2001	8504393341	11:44:18	8504375873	8504370537	\$2.05	\$1.95	
05/30/2001	5615140614	18:49:11	5617950029	5618325672	\$1.92	\$1.84	

Impact:

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs for bill reconciliation and pursuit of bill corrections.



BellSouth Florida OSS Testing Evaluation

Date: August 20, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Functional Carrier Bill Evaluation (TVV11).

Exception:

BellSouth delivered Resale bills to KPMG Consulting reflecting incorrect usage charges for calls made by KPMG Consulting during the course of the Functional Carrier Bill Evaluation (TVV11).

Background:

For calls placed by the KPMG Consulting Reseller, BellSouth's billing guidelines stipulate that charges will be calculated following BellSouth's established Tariff rates, less the appropriate wholesale discount.

Issue:

During the period between May 29-June 1, 2001, KPMG Consulting conducted a DUF retest. KPMG Consulting placed calls from five different locations on a variety of switch types during this retest. Upon review of the resale bills from BellSouth following test execution, KPMG Consulting noted that the associated bills incorrectly reflect charges for intralata toll, collect and third party calls. The following tables show the noted occurrences

Intralata Toll Calls Table 1:

Date	From Number	Initiation Time	To Number	Bill Number	Expected Charge	Actual Charge
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05/31/2001	8504393341	16:44:54	8506783815	8504393341	\$0.17	\$0.09
05/31/2001	8504393341	16:44:07	8502444252	8504393341	\$0.10	\$0.06
05/30/2001	8504393341	19:01:18	8502432135	8504393341	\$0.13	\$0.09
05/30/2001	8504393341	19:02:21	8502444252	8504393341	\$0.08	\$0.05
05/30/2001	8504393341	19:03:00	8506783815	8504393341	\$0.08	\$0.06



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Collect Calls Table 2:

Date	From Number	Initiation Time	To Number	Billed Number	Expected Charge	Actual Charge
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05/30/2001	8504370537	9:59:36	8504291707	8504291707	\$2.05	\$1.56
05/30/2001	8504370537	10:18:00	8504385942	8504385942	\$2.05	\$1.93
05/29/2001	8504370537	11:32:45	8504385942	8504385942	\$1.56	\$1.46
05/30/2001	8504291707	9:42:51	8504385942	8504385942	\$1.56	\$1.46
05/30/2001	8504393341	9:51:49	8504370537	8504370537	\$1.56	\$1.46
05/30/2001	8504393341	10:41:49	8504291707	8504291707	\$2.05	\$1.95
05/30/2001	5615140599	16:47:21	5618325672	5618325672	\$1.92	\$1.84
05/30/2001	5615140614	15:26:01	5618325672	5618325672	\$1.45	\$1.37
05/30/2001	5615140614	16:11:15	5618325672	5618325672	\$1.92	\$1.84

Third Party Calls Table 3:

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05/31/2001	8504393341	10:36:04	8504375873	8504291707	\$2.05	\$1.56				
05/30/2001	8504385942	10:44:24	8509392321	8504370537	\$1.92	\$1.54				
05/30/2001	8504385942	11:21:44	8504344546	8504370537	\$1.92	\$2.04				
05/30/2001	8504291707	11:24:54	8504777155	8504385942	\$2.05	\$1.93				
05/30/2001	8504370537	11:16:51	8504344565	8504385942	\$2.05	\$1.93				
05/29/2001	8504370537	11:53:03	8504799091	8504385942	\$1.56	\$1.46				
05/30/2001	8504393341	11:19:34	8504344565	8504291707	\$1.56	\$1.46				
05/30/2001	8504393341	11:44:18	8504375873	8504370537	\$2.05	\$1.95				
05/30/2001	5615140614	18:49:11	5617950029	5618325672	\$1.92	\$1.84				

Amendment:

In the original release of Exception 96, KPMG Consulting inadvertently omitted referencing the Directory Assistance Calls for which the expected charges varied from the actual charges on the bills. The following table shows all occurrences where these differences were noted.

Directory Assistance Calls Table A1:

Date	From Number	Initiation Time	To Number		Expected Charge	Actual Charge
05/29/2001	3059538819	11:21:46	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	11:26:04	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	11:44:29	3054110000	3059538819	\$0.23	\$0.19



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	From	Initiation			Expected	Actual
Date	Number	Time	To Number	Bill Number	Charge	Charge
05/29/2001	3059538819	11:55:29	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	12:21:44	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	18:27:23	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	18:31:12	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	18:34:31	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	19:47:12	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	19:51:13	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	19:58:37	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	10:03:59	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	10:36:01	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	11:31:10	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	13:02:41	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	13:09:00	3054110000	3059538819	\$0.23	\$0.19
05/31/2001	3059538819	15:48:48	3054110000	3059538819	\$0.23	\$0.19
05/31/2001	3059538819	15:53:23	3054110000	3059538819	\$0.23	\$0.19
05/31/2001	3059538819	16:03:29	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	8504291707	14:21:44	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504291707	14:54:12	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504291707	15:00:03	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504291707	17:28:20	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	12:15:00	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	12:21:54	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	13:05:17	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	13:22:05	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504370537	14:55:44	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504370537	15:10:19	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504370537	15:15:55	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504370537	17:11:48	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	10:49:07	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	11:46:50	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	12:38:26	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	13:10:00	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504385942	14:23:12	8504110000	8504385942	\$0.23	\$0.19
05/29/2001	8504385942	15:12:22	8504110000	8504385942	\$0.23	\$0.19
05/30/2001	8504385942	10:50:27	8504110000	8504385942	\$0.23	\$0.19
05/30/2001	8504385942	11:48:24	8504110000	8504385942	\$0.23	\$0.19
05/30/2001	8504385942	12:35:42	8504110000	8504385942	\$0.23	\$0.19
05/31/2001	9547792439	10:07:45	9544110000	9547792439	\$0.25	\$0.20
05/31/2001	9547792439	10:45:27	9544110000	9547792439	\$0.25	\$0.20
05/31/2001	9547792439	10:59:07	9544110000	9547792439	\$0.25	\$0.20



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Date	From Number	Initiation Time	To Number	Bill Number	Expected Charge	Actual Charge
05/31/2001	9547792439	11:05:29	9544110000	9547792439	\$0.25	\$0.20
06/01/2001	9547792439	8:47:35	9544110000	9547792439	\$0.25	\$0.20
05/31/2001	9547792612	8:48:45	9544110000	9547792612	\$0.25	\$0.20
05/31/2001	9547792612	8:54:53	9544110000	9547792612	\$0.25	\$0.20
05/31/2001	9547792612	9:08:10	9544110000	9547792612	\$0.25	\$0.20
05/31/2001	9547792612	9:13:47	9544110000	9547792612	\$0.25	\$0.20
06/01/2001	9547792612	9:29:47	9544110000	9547792612	\$0.25	\$0.20

Impact:

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs for bill reconciliation and pursuit of bill corrections.



Florida OSS Test Amended Exception 96

August 23, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Functional Carrier Bill Evaluation (TVV11).

Exception:

BellSouth delivered Resale bills to KPMG Consulting reflecting incorrect usage charges for calls made by KPMG Consulting during the course of the Functional Carrier Bill Evaluation (TVV11).

Background:

For calls placed by the KPMG Consulting Reseller, BellSouth's billing guidelines stipulate that charges will be calculated following BellSouth's established Tariff rates, less the appropriate wholesale discount.

Issue:

During the period between May 29-June 1, 2001, KPMG Consulting conducted a DUF retest. KPMG Consulting placed calls from five different locations on a variety of switch types during this retest. Upon review of the resale bills from BellSouth following test execution, KPMG Consulting noted that the associated bills incorrectly reflect charges for intralata toll, collect and third party calls. The following tables show the noted occurrences

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05/31/2001	8504393341	16:44:54	8506783815	8504393341	\$0.17	\$0.09
05/31/2001	8504393341	16:44:07	8502444252	8504393341	\$0.10	\$0.06
05/30/2001	8504393341	19:01:18	8502432135	8504393341	\$0.13	\$0.09
05/30/2001	8504393341	19:02:21	8502444252	8504393341	\$0.08	\$0.05
05/30/2001	8504393341	19:03:00	8506783815	8504393341	\$0.08	\$0.06

Collect Calls Table 2:

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05/30/2001	8504370537	9:59:36	8504291707	8504291707	\$2.05	\$1.56
05/30/2001	8504370537	10:18:00	8504385942	8504385942	\$2.05	\$1.93
05/29/2001	8504370537	11:32:45	8504385942	8504385942	\$1.56	\$1.46
05/30/2001	8504291707	9:42:51	8504385942	8504385942	\$1.56	\$1.46
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05/30/2001	5615140599	16:47:21	5618325672	5618325672	\$1.92	\$1.84
05/30/2001	5615140614	15:26:01	5618325672	5618325672	\$1.45	\$1.37
05/30/2001	5615140614	16:11:15	5618325672	5618325672	\$1.92	\$1.84

Third Party Calls Table 3:

Date	From Number	Initiation Time	To Number	Bill Number	Expected Charge	Actual Charge
05/30/2001	8504370537	10:38:41	8509325361	8504385942	\$2.05	\$1.46
05/31/2001	8504393341	10:36:04	8504375873	8504291707	\$2.05	\$1.56
05/30/2001	8504385942	10:44:24	8509392321	8504370537	\$1.92	\$1.54
05/30/2001	8504385942	11:21:44	8504344546	8504370537	\$1.92	\$2.04
05/30/2001	8504291707	11:24:54	8504777155	8504385942	\$2.05	\$1.93
05/30/2001	8504370537	11:16:51	8504344565	8504385942	\$2.05	\$1.93
05/29/2001	8504370537	11:53:03	8504799091	8504385942	\$1.56	\$1.46
05/30/2001	8504393341	11:19:34	8504344565	8504291707	\$1.56	\$1.46
05/30/2001	8504393341	11:44:18	8504375873	8504370537	\$2.05	\$1.95
05/30/2001	5615140614	18:49:11	5617950029	5618325672	\$1.92	\$1.84

Amendment:

In the original release of Exception 96, KPMG Consulting inadvertently omitted referencing the Directory Assistance Calls for which the expected charges varied from the actual charges on the bills. The following table shows all occurrences where these differences were noted.

Directory Assistance Calls Table A1:

Date	From Number	Initiation Time	To Number	Bill Number	Expected Charge	Actual Charge
05/29/2001	3059538819	11:21:46	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	11:26:04	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	11:44:29	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	11:55:29	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	12:21:44	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	18:27:23	3054110000	3059538819	\$0.23	\$0.19

Date	From Number	Initiation Time	To Number	Bill Number	Expected Charge	Actual Charge
05/29/2001	3059538819	18:31:12	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	18:34:31	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	19:47:12	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	19:51:13	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	19:58:37	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	10:03:59	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	10:36:01	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	11:31:10	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	13:02:41	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	13:09:00	3054110000	3059538819	\$0.23	\$0.19
05/31/2001	3059538819	15:48:48	3054110000	3059538819	\$0.23	\$0.19
05/31/2001	3059538819	15:53:23	3054110000	3059538819	\$0.23	\$0.19
05/31/2001	3059538819	16:03:29	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	8504291707	14:21:44	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504291707	14:54:12	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504291707	15:00:03	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504291707	17:28:20	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	12:15:00	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	12:21:54	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	13:05:17	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	13:22:05	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504370537	14:55:44	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504370537	15:10:19	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504370537	15:15:55	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504370537	17:11:48	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	10:49:07	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	11:46:50	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	12:38:26	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	13:10:00	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504385942	14:23:12	8504110000	8504385942	\$0.23	\$0.19
05/29/2001	8504385942	15:12:22	8504110000	8504385942	\$0.23	\$0.19
05/30/2001	8504385942	10:50:27	8504110000	8504385942	\$0.23	\$0.19
05/30/2001	8504385942	11:48:24	8504110000	8504385942	\$0.23	\$0.19
05/30/2001	8504385942	12:35:42	8504110000	8504385942	\$0.23	\$0.19
05/31/2001	9547792439	10:07:45	9544110000	9547792439	\$0.25	\$0.20
05/31/2001	9547792439	10:45:27	9544110000	9547792439	\$0.25	\$0.20
05/31/2001	9547792439	10:59:07	9544110000	9547792439	\$0.25	\$0.20
05/31/2001	9547792439	11:05:29	9544110000	9547792439	\$0.25	\$0.20
06/01/2001		8:47:35	9544110000	9547792439	\$0.25	\$0.20
05/31/2001		8:48:45	9544110000	9547792612	\$0.25	\$0.20
05/31/2001	9547792612	8:54:53	9544110000	9547792612	\$0.25	\$0.20
05/31/2001	9547792612	9:08:10	9544110000	9547792612	\$0.25	\$0.20
05/31/2001		9:13:47	9544110000	9547792612	\$0.25	\$0.20
06/01/2001	9547792612	9:29:47	9544110000	9547792612	\$0.25	\$0.20

Impact:

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs for bill reconciliation and pursuit of bill corrections.

BellSouth Response:

1. Intralata Toll Calls – Table I

- a. The resale discount was not applied to the first two (2) calls due to program logic. This logic was applicable to a very limited number of recirculated calls associated with certain types of service order activity on the account. This situation was detected by BellSouth and corrected on July 23, 2001.
- b. The remaining five (5) calls defaulted to the lowest rate (residence resale discount) and were sent to error processing because the service order guide for this account was not present at the time of rating. This situation is in parity with retail rating under the same circumstances. A program change will be implemented on August 28, 2001 to rerate these calls after service order guides are established.

The 7 calls in the two scenarios above represent less than 1% of the approximately 1100 resale calls made in the test and the total net billing difference is 6 cents. Please note that the calls are not a representative sample but total number of occurrences of calls in these scenarios.

2. Collect Calls - Table 2

The ten (10) calls shown on Table 2 were correctly rated at local rates and applicable surcharges were applied. Below is an example of the rates applied.

Collect Call	s:					
<u>Date</u> 05/30/2001	<u>From</u> <u>Number</u> 8504385942	Initiation Time 10:23:28	<u>To</u> <u>Number</u> 8504370537	Billed Number 8504370537	Expected Charge \$2.05	Actual Charge \$1.54
	Rating of Call:	\$1.75 <u>0.10</u> \$1.85	Collect Call Sur Message Rate C			
		<u>-16.81%</u> \$1.54	Reseller Discou Billable Amour	int for Residence		!

3. Third Party Calls - Table 3

The ten (10) calls shown on Table 3 were correctly rated at local rates and applicable surcharges were applied. Below is an example of the rates applied.

Third Party	Calls:					
<u>Date</u> 05/30/2001	<u>From</u> <u>Number</u> 8504370537	Initiation Time 11:16:51	<u>To</u> <u>Number</u> 8504344565	Billed Number 8504385942	Expected Charge \$2.05	Actual Charge \$1.93
	Rating of Call:	\$1.75 0.60 <u>0.12</u> \$2.47	Collect Call Su Operator Assist Message Rate C	ted Surcharge		
		<u>-21.83%</u> \$1.93	Reseller Discou Billable Amour			

4. Directory Assistance Calls – Table A1

The fifty (50) calls in this table were correctly rated according to BellSouth policy. Effective May 23, 2001 a rate increase from 25 to 30 cents was implemented for local Directory Assistance. However, since Direct Dialed Directory Assistance is bulk billed and rated on bill day, BellSouth implements new rates one month after the rate increase effective date. This prevents overbilling of calls made prior to the rate increase that have not billed. The resale discount is also applied to these rates.



Florida OSS Test Amended Exception 96

September 18, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Functional Carrier Bill Evaluation (TVV11).

Exception:

BellSouth delivered Resale bills to KPMG Consulting reflecting incorrect usage charges for calls made by KPMG Consulting during the course of the Functional Carrier Bill Evaluation (TVV11).

Background:

For calls placed by the KPMG Consulting Reseller, BellSouth's billing guidelines stipulate that charges will be calculated following BellSouth's established Tariff rates, less the appropriate wholesale discount.

Issue:

During the period between May 29-June 1, 2001, KPMG Consulting conducted a DUF retest. KPMG Consulting placed calls from five different locations on a variety of switch types during this retest. Upon review of the resale bills from BellSouth following test execution, KPMG Consulting noted that the associated bills incorrectly reflect charges for intralata toll, collect and third party calls. The following tables show the noted occurrences

Intralata Toll Calls Table 1:

Date	From Number	Initiation Time	To Number	Bill Number	Expected Charge	Actual Charge
05/31/2001	3059538819	12:49:45	5616553735	3059538819	\$0.50	\$0.64
05/30/2001	5618325672	10:21:24	3056858869	5618325672	\$0.48	\$0.61
05/31/2001	8504393341	16:44:54	8506783815	8504393341	\$0.17	\$0.09
05/31/2001	8504393341	16:44:07	8502444252	8504393341	\$0.10	\$0.06
05/30/2001	8504393341	19:01:18	8502432135	8504393341	\$0.13	\$0.09
05/30/2001	8504393341	19:02:21	8502444252	8504393341	\$0.08	\$0.05
05/30/2001	8504393341	19:03:00	8506783815	8504393341	\$0.08	\$0.06

Collect Calls Table 2:

Date	From Number	Initiation Time	To Number	Billed Number	Expected Charge	Actual Charge
05/30/2001	8504385942	10:23:28	8504370537	8504370537	\$2.05	\$1.54
05/30/2001	8504370537	9:59:36	8504291707	8504291707	\$2.05	\$1.56
05/30/2001	8504370537	10:18:00	8504385942	8504385942	\$2.05	\$1.93
05/29/2001	8504370537	11:32:45	8504385942	8504385942	\$1.56	\$1.46
05/30/2001	8504291707	9:42:51	8504385942	8504385942	\$1.56	\$1.46
05/30/2001	8504393341	9:51:49	8504370537	8504370537	\$1.56	\$1.46
05/30/2001	8504393341	10:41:49	8504291707	8504291707	\$2.05	\$1.95
05/30/2001	5615140599	16:47:21	5618325672	5618325672	\$1.92	\$1.84
05/30/2001	5615140614	15:26:01	5618325672	5618325672	\$1.45	\$1.37
05/30/2001	5615140614	16:11:15	5618325672	5618325672	\$1.92	\$1.84

Third Party Calls Table 3:

Date	From Number	Initiation Time	To Number	Bill Number	Expected Charge	Actual Charge
05/30/2001	8504370537	10:38:41	8509325361	8504385942	\$2.05	\$1.46
05/31/2001	8504393341	10:36:04	8504375873	8504291707	\$2.05	\$1.56
05/30/2001	8504385942	10:44:24	8509392321	8504370537	\$1.92	\$1.54
05/30/2001	8504385942	11:21:44	8504344546	8504370537	\$1.92	\$2.04
05/30/2001	8504291707	11:24:54	8504777155	8504385942	\$2.05	\$1.93
05/30/2001	8504370537	11:16:51	8504344565	8504385942	\$2.05	\$1.93
05/29/2001	8504370537	11:53:03	8504799091	8504385942	\$1.56	\$1.46
05/30/2001	8504393341	11:19:34	8504344565	8504291707	\$1.56	\$1.46
05/30/2001	8504393341	11:44:18	8504375873	8504370537	\$2.05	\$1.95
05/30/2001	5615140614	18:49:11	5617950029	5618325672	\$1.92	\$1.84

Amendment:

In the original release of Exception 96, KPMG Consulting inadvertently omitted referencing the Directory Assistance Calls for which the expected charges varied from the actual charges on the bills. The following table shows all occurrences where these differences were noted.

Directory Assistance Calls Table A1:

Date	From Number	Initiation Time	To Number	Bill Number	Expected Charge	Actual Charge
05/29/2001	3059538819	11:21:46	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	11:26:04	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	11:44:29	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	11:55:29	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	12:21:44	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	18:27:23	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	18:31:12	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	18:34:31	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	19:47:12	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	19:51:13	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	3059538819	19:58:37	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	10:03:59	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	10:36:01	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	11:31:10	3054110000	3059538819	\$0.23	\$0.19
05/30/2001	3059538819	13:02:41	3054110000	3059538819	\$0.23	\$0.19

		Initiation			Expected	Actual
Date	From Number	Time	To Number	Bill Number	Charge	Charge
05/30/2001	3059538819	13:09:00	3054110000	3059538819	\$0.23	\$0.19
05/31/2001	3059538819	15:48:48	3054110000	3059538819	\$0.23	\$0.19
05/31/2001	3059538819	15:53:23	3054110000	3059538819	\$0.23	\$0.19
05/31/2001	3059538819	16:03:29	3054110000	3059538819	\$0.23	\$0.19
05/29/2001	8504291707	14:21:44	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504291707	14:54:12	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504291707	15:00:03	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504291707	17:28:20	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	12:15:00	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	12:21:54	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	13:05:17	8504110000	8504291707	\$0.25	\$0.19
05/30/2001	8504291707	13:22:05	8504110000	8504291707	\$0.25	\$0.19
05/29/2001	8504370537	14:55:44	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504370537	15:10:19	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504370537	15:15:55	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504370537	17:11:48	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	10:49:07	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	11:46:50	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	12:38:26	8504110000	8504370537	\$0.25	\$0.19
05/30/2001	8504370537	13:10:00	8504110000	8504370537	\$0.25	\$0.19
05/29/2001	8504385942	14:23:12	8504110000	8504385942	\$0.23	\$0.19
05/29/2001	8504385942	15:12:22	8504110000	8504385942	\$0.23	\$0.19
05/30/2001	8504385942	10:50:27	8504110000	8504385942	\$0.23	\$0.19
05/30/2001	8504385942	11:48:24	8504110000	8504385942	\$0.23	\$0.19
05/30/2001	8504385942	12:35:42	8504110000	8504385942	\$0.23	\$0.19
05/31/2001	9547792439	10:07:45	9544110000	9547792439	\$0.25	\$0.20
05/31/2001	9547792439	10:45:27	9544110000	9547792439	\$0.25	\$0.20
05/31/2001	9547792439	10:59:07	9544110000	9547792439	\$0.25	\$0.20
05/31/2001	9547792439	11:05:29	9544110000	9547792439	\$0.25	\$0.20
06/01/2001	9547792439	8:47:35	9544110000	9547792439	\$0.25	\$0.20
05/31/2001	9547792612	8:48:45	9544110000	9547792612	\$0.25	\$0.20
05/31/2001	9547792612	8:54:53	9544110000	9547792612	\$0.25	\$0.20
05/31/2001	9547792612	9:08:10	9544110000	9547792612	\$0.25	\$0.20
05/31/2001	9547792612	9:13:47	9544110000	9547792612	\$0.25	\$0.20
06/01/2001	9547792612	9:29:47	9544110000	9547792612	\$0.25	\$0.20

Impact:

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs for bill reconciliation and pursuit of bill corrections.

BellSouth Response:

1. Intralata Toll Calls - Table I

a. The resale discount was not applied to the first two (2) calls due to program logic. This logic was applicable to a very limited number of recirculated calls associated with certain types of service order activity on the account. This situation was detected by BellSouth and corrected on July 23, 2001.

b. The remaining five (5) calls defaulted to the lowest rate (residence resale discount) and were sent to error processing because the service order guide for this account was not present at the time of rating. This situation is in parity with retail rating under the same circumstances. A program change will be implemented on August 28, 2001 to rerate these calls after service order guides are established.

The 7 calls in the two scenarios above represent less than 1% of the approximately 1100 resale calls made in the test and the total net billing difference is 6 cents. Please note that the calls are not a representative sample but total number of occurrences of calls in these scenarios.

2. Collect Calls - Table 2

The ten (10) calls shown on Table 2 were correctly rated at local rates and applicable surcharges were applied. Below is an example of the rates applied.

Collect Calls:						
	<u>From</u>	Initiation	<u>To</u>	Billed	Expected	<u>Actual</u>
<u>Date</u>	Number	<u>Time</u>	Number	Number	<u>Charge</u>	<u>Charge</u>
05/30/2001	8504385942	10:23:28	8504370537	8504370537	\$2.05	\$1.54
	Rating of Call:	\$1.75	Collect Call Surch	arge		
1		<u>0.10</u>	Message Rate Cha	rge		
		\$1.85				
		<u>-16.81%</u>	Reseller Discount	for Residence		
		\$1.54	Billable Amount			

3. Third Party Calls - Table 3

The ten (10) calls shown on Table 3 were correctly rated at local rates and applicable surcharges were applied. Below is an example of the rates applied.

Third Party C	alls:					
	<u>From</u>	Initiation	<u>To</u>	Billed	Expected	<u>Actual</u>
<u>Date</u>	<u>Number</u>	<u>Time</u>	Number	Number	Charge	<u>Charge</u>
05/30/2001	8504370537	11:16:51	8504344565	8504385942	\$2.05	\$1.93
	Rating of Call:	\$1.75	Collect Call Surcharge			
		0.60	Operator Assisted	Surcharge		
		<u>0.12</u>	Message Rate Cha	rge		
		\$2.47				
		<u>-21.83%</u>	Reseller Discount	for Business		:
		\$1.93	Billable Amount			

4. Directory Assistance Calls – Table A1

The fifty (50) calls in this table were correctly rated according to BellSouth policy. Effective May 23, 2001 a rate increase from 25 to 30 cents was implemented for local Directory Assistance. However, since Direct Dialed Directory Assistance is bulk billed and rated on bill day, BellSouth implements new rates one month after the rate increase effective date. This prevents overbilling of calls made prior to the rate increase that have not billed. The resale discount is also applied to these rates.

BellSouth Amended Response:

1. Intralata Toll Calls – Table I

a. The resale discount was not applied to the first two (2) calls due to program logic. This logic was applicable to a very limited number of recirculated calls associated with certain types of service order activity on the account. This situation was detected by BellSouth and corrected on July 23, 2001. The remaining five (5) calls defaulted to the lowest rate (residence resale discount) and were sent to error processing because the service order guide for this account was not present at the time of rating. This situation is in parity with retail rating under the same circumstances. A program change was implemented on September 5, 2001 to rerate these calls after service order guides are established.

b. The 7 calls in the two scenarios above represent less than 1% of the approximately 1100 resale calls made in the test and the total net billing difference is 6 cents. Please note that the calls are not a representative sample but total number of occurrences of calls in these scenarios.

2. Collect Calls – Table 2

The ten (10) calls shown on Table 2 were correctly rated at local rates and applicable surcharges were applied. The rating applied to each call is shown below.

The Operator Dialed Surcharge is determined by the Automation Indicator in position 412 of the DUF record (913 module). An "A" means that the call was automated. An "M" means that the call was manual (operator dialed). When the indicator is "M" the \$.60 Operator Dialed surcharge is applied. This surcharge is not billed based on the Recording Method indicator (position 193-194), as the KPMG calculations assumed.

Collect Calls:

	Collect Call	s:					
Ì		<u>From</u>	Initiation	<u>To</u>	Billed	Expected	Actual
1	<u>Date</u>	Number	<u>Time</u>	<u>Number</u>	Number	Charge	<u>Charge</u>
	05/30/2001	8504385942	10:23:28	8504370537	8504370537	\$2.05	\$1.54
		Rating of Call:	\$1.75	Collect Call Surc			
			<u>0.10</u>	Message Rate Ch	arge (Res.)		
			\$1.85				
			<u>-16.81%</u>	Reseller Discoun			
			\$1.54	Billable Amount			
		From	Initiation	<u>To</u>	Billed	Expected	Actual
2	<u>Date</u>	Number	<u>Time</u>	Number	Number	Charge	Charge
1	05/30/2001	8504370537	9:59:36	8504291707	8504291707	\$2.05	\$1.56
		Rating of Call:	\$1.75	Collect Call Surc	harge		
			<u>0.12</u>	Message Rate Ch	arge (Bus.)		
			\$1.87				
			<u>-16.81%</u>	Reseller Discoun			
1			\$1.56	Billable Amount			
		<u>From</u>	Initiation	<u>To</u>	Billed	Expected	<u>Actual</u>
3	Date	Number	Time	Number	<u>Number</u>	<u>Charge</u>	<u>Charge</u>
	05/30/2001	8504370537	10:18:00	8504385942	8504385942	\$2.05	\$1.93
						42.30	*****
ļ		Rating of Call:	\$1.75	Collect Call Surc	harge		
			0.60	Operator Assisted	i Surcharge		
			<u>0.12</u>	Message Rate Ch	arge (Bus.)		
			\$2.47				
]			<u>-21.83%</u>	Reseller Discount	t for Residence		
1			\$1.93	Billable Amount			
1		<u>From</u>	Initiation	<u>To</u>	Billed	Expected	Actual
4	Date	Number	<u>Time</u>	Number	Number	<u>Charge</u>	<u>Charge</u>

	Collect Call	s:					
	05/29/2001	8504370537	11:32:45	8504385942	8504385942	\$1.56	\$1.46
		Rating of Call:	\$1.75	Collect Call Surc	harge		
		Ruting of Can.	0.12	Message Rate Ch	_		
l			\$1.87	Message Rate Cil	large (Bus.)		
			·	Reseller Discoun	t for Dogidanaa		
			<u>-21.83%</u>				İ
			\$1.46	Billable Amount			
ł		<u>From</u>	Initiation	<u>To</u>	Billed	Expected	<u>Actual</u>
5	<u>Date</u>	Number	<u>Time</u>	<u>Number</u>	Number	<u>Charge</u>	Charge
1	05/30/2001	8504291707	9:42:51	8504385942	8504385942	\$1.56	\$1.46
		Rating of Call:	\$1.75	Collect Call Surcharge			
			0.12	Message Rate Charge (Bus.)			
			\$1.87				
1			<u>-21.83%</u>	Reseller Discoun			
1			\$1.46	Billable Amount			
		<u>From</u>	Initiation	<u>To</u>	Billed	Expected	<u>Actual</u>
6	<u>Date</u>	<u>Number</u>	<u>Time</u>	Number	Number	<u>Charge</u>	<u>Charge</u>
	05/30/2001	8504393341	9:51:49	8504370537	8504370537	\$1.56	\$1.46
		Rating of Call:	\$1.75	Collect Call Surc	harge		
			<u>-16.81%</u>	Reseller Discoun	t for Business		
			\$1.46	Billable Amount			
		From	Initiation	To Billed Ex		Expected	Actual
7	Date	Number	Time	<u>Number</u>	<u>Number</u>	<u>Charge</u>	<u>Charge</u>
′	05/30/2001	8504393341	10:41:49	8504291707	8504291707	\$2.05	\$1.95
	03/30/2001	0304393341	10.41.49	6304291707	6304291707	\$2.03	\$1.93
1		Rating of Call:	\$1.75	Collect Call Surcharge			
			<u>0.60</u>	Operator Assisted Surcharge			
			\$2.35	- -		j	
1			<u>-16.81%</u>	Reseller Discount for Business			
1			\$1.95	Billable Amount			
		<u>From</u>	<u>Initiation</u>	To	Billed	Expected []	<u>Actual</u>
8	<u>Date</u>	Number	<u>Time</u>	Number	Number	Charge	Charge
	05/30/2001	5615140599	16:47:21	5618325672	5618325672	\$1.92	\$1.84

	Collect Call	s:					
		Rating of Call:	\$1.75	Collect Call Surcharge			
			0.60	Operator Assisted Surcharge			
			\$2.35				
			<u>-21.83%</u>	Reseller Discount for Residence			
			\$1.84	Billable Amount			
		<u>From</u>	Initiation	<u>To</u>	<u>Billed</u>	Expected	<u>Actual</u>
9	<u>Date</u>	<u>Number</u>	<u>Time</u>	<u>Number</u>	Number	<u>Charge</u>	<u>Charge</u>
	05/30/2001	5615140614	15:26:01	5618325672	5618325672	\$1.45	\$1.37
İ		Rating of Call:	\$1.75	Collect Call Surc	harge		
			<u>-21.83%</u>	Reseller Discoun	t for Residence		
			\$1.37	Billable Amount			i
		T	T 111 41	The Paris I have			
	_	<u>From</u>	Initiation				Actual
10	<u>Date</u>	Number	<u>Time</u>	Number	Number	<u>Charge</u>	<u>Charge</u>
	05/30/2001	5615140614	16:11:15	5618325672	5618325672	\$1.92	\$1.84
		Rating of Call:	\$1.75	Collect Call Surcharge			
			<u>0.60</u>	Operator Assisted Surcharge			
			\$2.35				
			<u>-21.83%</u>	Reseller Discoun	t for Residence		
			\$1.84	Billable Amount			

3. Third Party Calls - Table 3

The ten (10) calls shown on Table 3 were correctly rated at local rates and applicable surcharges were applied. The rating applied to each call is shown below.

From Initiation To Billed Expected Actual 1 Date Number Time Number Number Charge Charge		Third Party	V Calls:			
05/30/2001 8504370537 10:38:41 8509325361 8504385942 \$2.05 \$1.46	1	<u>Date</u> 05/30/2001			 	

	This Dead	C.II.					
	Third Party	Rating of Call:	\$1.75	Third Number Ca	II Curcharae		
		Rating of Can:	0.12	Message Rate Ch	_		
			<u>0.12</u> \$1.87	Message Kale Ch	large (Bus.)		
			·	Reseller Discoun	t for Posidonae		
			<u>-21.83%</u> \$1.46	Billable Amount			
			\$1.40	Billable Alliount			
		<u>From</u>	Initiation	<u>To</u>	Billed	Expected	<u>Actual</u>
2	Date	Number	Time	Number	Number	Charge	Charge
1	05/31/2001	8504393341	10:36:04	8504375873	<u>8504291707</u>	\$2.05	\$1.56
					••••	*	43.53
		Rating of Call:	\$1.75	Third Number Ca	all Surcharge		
			0.12	Message Rate Ch	arge (Bus.)		
			\$1.87				
1			<u>-16.81%</u>	Reseller Discoun	t for Business		
			\$1.56	Billable Amount			
İ							
j		<u>From</u>	Initiation	<u>To</u>	Billed	Expected	<u>Actual</u>
3	<u>Date</u>	<u>Number</u>	<u>Time</u>	Number	Number	<u>Charge</u>	<u>Charge</u>
	05/30/2001	8504385942	10:44:24	8509392321	8504370537	\$1.92	\$1.54
		Rating of Call:	\$1.75	Third Number Ca	all Surcharge		
			0.10	Message Rate Ch	arge (Res.)		
			\$1.85				
			<u>-16.81%</u>	Reseller Discoun	t for Business		
			\$1.54	Billable Amount			
		_				_	
4	_	From	Initiation	To	Billed	Expected	Actual
	<u>Date</u>	Number	<u>Time</u>	Number	Number	Charge	<u>Charge</u>
	05/30/2001	8504385942	11:21:44	8504344546	8504370537	\$1.92	\$2.04
		Rating of Call:	\$1.75	Collect Call Surc	_		
			\$0.60	Third Number Ca	_		
			<u>0.10</u>	Message Rate Ch	arge (Res.)		

	TI D	C					
	Third Party	Calls:	\$2.45 -16.81% \$2.04	Reseller Discoun			
5	<u>Date</u> 05/30/2001	From Number 8504291707 Rating of Call:	Initiation Time 11:24:54 \$1.75 0.60 0.12 \$2.47 -21.83% \$1.93	To Number 8504777155 Third Number Ca Operator Assisted Message Rate Ch Reseller Discoun Billable Amount	d Surcharge targe (Bus.)	Expected Charge \$2.05	Actual Charge \$1.93
6	<u>Date</u> 05/30/2001	From Number 8504370537 Rating of Call:	Initiation Time 11:16:51 \$1.75 0.60 0.12 \$2.47 -21.83%	To Number 8504344565 Third Number Ca Operator Assisted Message Rate Ch Reseller Discount	d Surcharge targe (Bus.)	Expected Charge \$2.05	Actual Charge \$1.93
7	<u>Date</u> 05/29/2001	From Number 8504370537 Rating of Call:	\$1.93 Initiation Time 11:53:03 \$1.75 0.12 \$1.87 -21.83% \$1.46	To Number 8504799091 Third Number Ca Message Rate Ch Reseller Discount Billable Amount	Billed Number 8504385942 all Surcharge arge (Bus.)	Expected Charge \$1.56	Actual Charge \$1.46

	Third Party	Calls:								
		<u>From</u>	Initiation	<u>To</u>	Billed	Expected	<u>Actual</u>			
8	<u>Date</u>	Number	<u>Time</u>	Number	Number	Charge	Charge			
1	05/30/2001	8504393341	11:19:34	8504344565	8504291707	\$1.56	\$1.46			
		Rating of Call:	\$1.75	Third Number Ca	all Caroborgo					
		Rating of Can.	*		_					
			<u>-16.81%</u>	Reseller Discount for Business Billable Amount						
			\$1.46	Biliable Amount						
		From	Initiation	<u>To</u>	Billed	Expected	<u>Actual</u>			
9	Date	Number	Time	Number	Number	Charge	Charge			
	05/30/2001	8504393341	11:44:18	8504375873	8504370537	\$2.05	\$1.95			
	03/30/2001	0301333311	11.11.10	0301313073	0301370337	Ψ2.05	Ψ1.55			
		Rating of Call:	\$1.75	Collect Call Surc	harge					
			0.60	Operator Assisted	d Surcharge					
			\$2.35							
			<u>-16.81%</u>	Reseller Discount for Business						
			\$1.95	Billable Amount						
		From	Initiation	<u>To</u>	Billed	Expected	<u>Actual</u>			
10	<u>Date</u>	Number	<u>Time</u>	Number	Number	Charge	<u>Charge</u>			
	05/30/2001	5615140614	18:49:11	5617950029	5618325672	\$1.92	\$1.84			
		Rating of Call:	\$1.75	Collect Call Surcharge						
			<u>0.60</u>	Operator Assisted Surcharge						
			\$2.35							
			<u>-21.83%</u>	Reseller Discoun	t for Residence					
			\$1.84	Billable Amount						

5. Directory Assistance Calls – Table A1

The fifty (50) calls in this table were correctly rated according to BellSouth policy. Effective May 23, 2001 a rate increase from 25 to 30 cents was implemented for local Directory Assistance. However, since Direct Dialed Directory Assistance is bulk billed and rated on bill day, BellSouth implements new rates one month after the rate increase effective date. This prevents overbilling of calls made prior to the rate increase that have not billed. The resale discount is also applied to these rates.

For future tariff filings for bulk billed Directory Assistance, BellSouth will include tariff language that reads "rate to take effect beginning on (date) billing period".